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Infrastructure, environment, buildings

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ENVIRONMENTAL

Subject:

City of Kalamazoo Interactions
Allied Paper, Inc./Kalamazoo River/Portage Creek Superfund Site
Allied Paper, Inc. Operable Unit (OU)

Date:

August 6, 2009

Dear Mr. Berkoff:

Contact:

Tim Scully-Granzeier

Phone:

312.263.6703

Our ref:

B0064587.0001.00004

ARCADIS, on behalf of Millennium Holdings, LLC (MHLLC)¹, understands that the City of Kalamazoo (City) expressed concerns, in part, about United States Environmental Protection Agency's (USEPA's) consideration of the City's comments on the *Remedial Investigation Report for the Allied Paper, Inc. Operable Unit (RI)* (Michigan Department of Environmental Quality [MDEQ] 2008) and the *Groundwater Evaluation and Work Plan for Supplemental Investigation (Work Plan)* (ARCADIS 2009b) for the referenced site. The City asserts that their comments were largely dismissed.

We recognize the City's continuing concern regarding the safety of the public water supply wellfield; however, ARCADIS does not agree with implications that the City's concerns have not been heard, that their questions have not been responded to, or that they have not had a substantive influence on the groundwater assessment activities. Per your request, this letter describes a timeline of numerous interactions with the City and other stakeholders and summarizes numerous changes made to the groundwater evaluation effort in direct response to City comments.

The Work Plan was designed to address key questions about the potential for polychlorinated biphenyls (PCBs) present at the Allied OU to migrate to the deeper regional aquifer beneath the Allied OU and subsequently to the City's drinking water

¹ LeMean Property Holdings Corporation (LeMean) owns the Kalamazoo River Allied site. LeMean is a wholly owned subsidiary of Millennium Holdings, LLC (MHLLC). MHLLC is directing the work at the site on behalf of LeMean.

wells. All parties agree that the City's drinking water wells are a critically important public resource.

While neither the City, USEPA, the MDEQ, nor MHLLC agreed with every comment made by other parties, the result was nevertheless a collaborative process that resulted in substantially improved information concerning Allied OU groundwater – information that appears to support the prior data showing that the City wellfield is not at risk. Analytical data from the City's drinking water wells (which have no detected PCBs) and hydrogeological data from studies commissioned and provided by the City, have both contributed significantly to the overall understanding of the Allied OU with respect to the City's drinking water wellfield.

Timeline of Interaction with City and Other Stakeholders

At the City's request, MHLLC and ARCADIS first met with the City and its consultant, NTH, on September 23, 2008 and October 27, 2008 to discuss the City's concerns and the objectives of a proposed groundwater study to evaluate potential pathways between the Allied OU and the City wellfield.

USEPA, MDEQ, MHLLC, and the City (and associated representatives), collectively the stakeholders, participated in a teleconference on December 16, 2008 to refine the groundwater study activities and discuss how the activities would contribute to the stated objective. Based on these discussions, on behalf of MHLLC, ARCADIS submitted the Draft Work Plan (ARCADIS 2009a) on March 6, 2009. Following submittal of the Draft Work Plan, USEPA held two teleconferences with the stakeholder group (March 16 and March 25, 2009) and a second stakeholder meeting on April 14, 2009 in Kalamazoo to review and discuss the draft.

ARCADIS made a series of modifications to scope and language of the Draft Work Plan in iterative steps in response to input from the City and other stakeholders and submitted a revised Final Work Plan (ARCADIS 2009b) on April 28, 2009, which was then approved by USEPA.

As ARCADIS moved forward with implementation of the USEPA-approved Work Plan, MHLLC and ARCADIS continued to correspond with the City via email and phone to work through other items, share data, and discuss preliminary conclusions. On July 28, 2009, all parties participated in a stakeholder meeting to further discuss preliminary data and conclusions. Subsequent to that discussion, MHLLC and ARCADIS are continuing to share and discuss information with the City to follow-up on questions concerning the preliminary data analysis.

Changes to the Workplan in Response to City and Other Stakeholder Comments

All stakeholders agreed on the importance of assessing groundwater flow potential. The City also advocated installation of new wells and chemical monitoring. USEPA did not support additional wells and chemical sampling for the initial phase of activity. Because these activities were unlikely to contribute to the objective of understanding groundwater flow, USEPA instead suggested that well installation and /or chemical analysis could be conducted, if warranted, after an initial evaluation of the groundwater data.

Specific revisions to the Draft Work Plan that were made in response to the City's input included:

- Characterization of the surficial flow regime to north and west of the Allied OU by adding Panelyte and Performance Paper wells to the proposed monitoring well network.
- Measuring the water level in the full network of monitoring wells and at multiple surface water locations. The monitoring well network increased by 60 percent and the number of surface water level measurement points doubled from what had been initially recommended.
- Research of additional City wells and expansion of the geologic cross-section to include the Millwood Station wells south of the Allied OU.
- Evaluation of vertical gradients at additional sets of nested wells at the Allied OU.
- Gauging the total well depth to assess well integrity.
- Resurvey of offsite well casing elevations.
- Collection of a second round of water levels from a subset of wells during a non-pumping period at the adjacent Strebor groundwater extraction system.
- Review of the temporal trends within historical well pair data to evaluate whether vertical gradients changed over time.
- Completion of a detailed drinking water well survey.

ARCADIS

Mr. Michael Berkoff
August 6, 2009

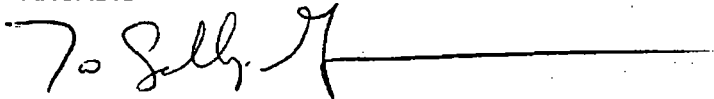
Closing

On behalf of MHLLC, I would like to emphasize that we have valued the City's input and dialogue with the stakeholders in this process. The final Work Plan benefited from City interaction and reflected a series of improvements on the draft. While our preliminary review of the groundwater study confirms pre-existing data and does not indicate a basis for further assessment, we remain committed to an open process and a dialogue with the City and other stakeholders to complete the feasibility study.

If you have questions or concerns regarding the information presented in this letter, please contact me at 312.263.6703.

Sincerely,

ARCADIS



Tim Scully-Granzeier
Project Manager

Copies:

Stephen Weishar, MHLLC
Mike Erickson, ARCADIS

References

ARCADIS. 2009a. DRAFT Groundwater Evaluation and Work Plan for Supplemental Investigation. March 6, 2009.

ARCADIS. 2009b. Groundwater Evaluation and Work Plan for Supplemental Investigation. April 28, 2009.

City of Kalamazoo. 2008. Interim Technical Responses to the Allied Paper Operable Unit Kalamazoo, Michigan Remedial Investigation Report. September 17, 2008.

MDEQ. 2008. Remedial Investigation Report for the Allied Paper, Inc. Operable Unit. March 2008.